

FILED

DEC - 1 2021

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

)

Plaintiff,

)

v.

)

DEANTRE BROWN,

)

Defendant.

)

4:21CR658 MTS/NCC

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, § 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with two counts of being a felon in possession of ammunition, in violation of 18 U.S.C. § 922(g), an offense for which a maximum ten years imprisonment is prescribed under Title 18.

2. According to the St. Louis Metropolitan Police Department (“SLMPD”), on August 18, 2021, SLMPD officers were called to a disturbance at Reign Restaurant and Nightclub, located at 1122 Washington Avenue. As SLMPD officers were addressing this disturbance, they heard multiple gunshots coming from the rear of the club. Officers located two individuals who were shot. One of the victims told SLMPD officers that doormen/security removed a woman from the club. The woman returned with a man, a disturbance ensued, and the male fired a gun, resulting in

the victims being shot. Surveillance video captured the shooting. The video shows the Reign doormen/security removing several people from the back door of the club. One of the individuals with the doormen jumps the railing to the street and yells toward a group of people outside. During this, the Defendant approached the group on the street. As the disturbance spilled into the street, the Defendant approached the doormen/security, who were standing on the raised ramp, leading to the door. The Defendant approached and pointed toward the male who jumped the railing. A female near the Defendant appears to nod, at which time the Defendant raised his firearm with his left hand and fired several shots towards the men standing on the ramp leading into the nightclub. Additional security video captured the Defendant parking his vehicle in a nearby parking garage before the shooting and returning to and leaving the same parking garage after the shooting. SLMPD officers seized multiple 9mm shell casings from the location from which the Defendant fired shots.

3. On September 22, 2021, the Defendant was taken into custody at his parole officer's office, located at 220 South Jefferson Avenue. The Defendant consented to a search of his vehicle (the same vehicle he used to flee the shooting). SLMPD officer's located a box containing 50 rounds of .22 caliber long rifle ammunition in the glovebox of the Defendant's vehicle.

4. The Defendant's criminal history reflects that he is currently on parole for the following felony conviction:

- 07SL-CR05274, *State of Missouri v. Deantre Brown*  
Guilty Plea/Sentence Date: July 9, 2008/September 15, 2008  
Count One: Assault in the First Degree  
Count Two: Armed Criminal Action  
Count Three: Assault in the First Degree  
Count Four: Armed Criminal Action  
Sentence: 15 years MDC

5. There is a serious risk that the Defendant will flee, given the Defendant's failure to comply with supervision while on parole, and the potential sentence the Defendant faces in this case.

6. The Defendant's criminal history and the nature and circumstances of the offense charged,

reflect that there is a serious danger to the community that would be posed by the defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Jennifer Szczucinski  
JENNIFER SZCZUCINSKI, #56906MO  
Assistant United States Attorney